

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

AWP, INC.,

Plaintiff,

v.

**SOUTHEASTERN TRAFFIC
SUPPLY, INC., STEPHEN
KOVACH, ROBERT PARRISH,
and ROSS SMITH,**

Defendants.

Case No.: 1:16-cv-01315-ELR

**JOINT MOTION FOR ENTRY OF CONSENT
ORDER FOR EXTENSION OF EXPEDITED DISCOVERY**

Plaintiff AWP, Inc. and Defendants Southeastern Traffic Supply, Inc., Stephen Kovach, Robert Parrish, and Ross Smith together move this Court to grant the attached proposed Consent Order for Extension of Expedited Discovery.

In its Order of May 16, 2016 (ECF No. 19), this Court granted the parties' Joint Motion for Entry of Consent Order for Expedited Discovery (ECF No. 18). Pursuant to the May 16 Order, the parties are to make themselves available for deposition within 60 days. The parties have been engaging in discovery diligently, including multiple exchanges of written discovery, and have depositions

scheduled. However, due to witness schedules the parties need until August 31, 2016 to complete the subject discovery.

The extension requested herein will allow the parties to complete these depositions without violating the May 16 Order. No party will be prejudiced by this extension, this is the only request for an extension of deadlines in this matter, and this request will not affect the close of regular fact discovery set by this Court for December 7, 2016 pursuant to its June 7, 2016 Scheduling Order (ECF No. 45).

Dated: July 14, 2016

s/ Stephen P. Fuller

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**Motion for Admission Pro Hac Vice
pending*

Counsel for Plaintiff AWP, Inc.

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**[PROPOSED] CONSENT ORDER FOR EXTENSION OF EXPEDITED
DISCOVERY**

For good cause shown, and based upon consent of the parties, it is hereby ordered that the deadline for the parties to complete expedited discovery pursuant to this Court's Order of May 16, 2016 (ECF No. 19) is extended to August 31, 2016.

SO ORDERED, this _____ day of _____, 2016.

Eleanor L. Ross
United States District Judge
Northern District of Georgia

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1D, I hereby certify that the foregoing **JOINT MOTION FOR ENTRY OF CONSENT ORDER FOR EXTENSION OF EXPEDITED DISCOVERY** has been prepared with one of the font and point selections (e.g., Times New Roman/14 point) approved by this Court in Local Rule 5.1B.

This 14th day of July, 2016.

s/ Candice M. Reder
One of Attorneys for Plaintiff

CERTIFICATE OF SERVICE

This is to certify that I have this day electronically filed the foregoing
**JOINT MOTION FOR ENTRY OF CONSENT ORDER FOR EXTENSION
OF EXPEDITED DISCOVERY** with the Clerk of Court using the CM/ECF
system which will automatically send email notification of such filing to the
following attorneys of record:

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This 14th day of July, 2016.

s/ Candice M. Reder
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